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May 30, 2023

BY ECF ONLY

The Honorable Denise L. Cote

U.S. District Judge

U.S. District Court

Southern District of New York

500 Pearl Street

New York, NY 10007

RE: *Carole Smith v. GLAAD, Inc.*, 22 Civ. 4389 (DLC)

*The parties may extend part
discovery on consent. Any
motion for summary judgment
remains due on 8/14/23.*

*Alvin Bk
5/31/23*

Dear Judge Cote:


This firm represents the Plaintiff, Carole Smith, in the above matter and I write together with counsel for Defendant to request an extension of the discovery and summary judgment motion deadlines. This is the parties' third request for such an extension. The parties understand that the Court may be reluctant to grant this request, but respectfully believe that under the particular circumstances here it is appropriate and necessary that this be granted.

The parties have completed document discovery and four depositions. They have also participated in a mediation and plan on attending the settlement conference before Magistrate Judge Katherine H. Parker scheduled for July 13, 2023.

Depositions completed in April caused the parties to identify additional discovery and the Plaintiff seeks to conduct one 90 minute remote deposition. The additional document discovery will be completed by the current June 1, 2023 deadline but the short deposition will not. Defendant is considering filing a 2-3 page letter motion opposing the deposition and several of Plaintiff's interrogatories served on April 24, 2023, which it will file today or tomorrow.

Based on the above, the parties seek: (1) a 15 day extension of the fact discovery deadline from June 1 to June 16, 2023; (2) retention of the July 13, 2023 settlement conference with Magistrate Judge Parker; and, (3) 30 day extensions of the deadlines for the motion, opposition and reply for summary judgment.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'B. Menken', with a long horizontal flourish extending to the right.

Bruce E. Menken

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cc: All Counsel by ECF